

EnviroMD

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October 5, 2015

Ms. Tamara Safarik, Esq.
McClagherty & Silver, P.C.
55 Old Santa Fe Trail
P.O. Box 8680
Santa Fe, New Mexico 87504-8680

Re: Gonzales v. Unfeker, M.D., et al.

Dear Ms. Safarik,

I am a physician licensed in the states of Arizona, California, Hawaii and New Mexico. I completed a Master of Science in Toxicology at the University of Arizona and I am a Board Certified Medical Toxicologist, a Board Certified Occupational and Environmental Physician, a Board Certified Emergency Physician, and a Board Certified Industrial Hygienist. Further details about my professional activities are provided in my *curriculum vitae*. I actively practice Medical Toxicology, Occupational and Environmental Medicine and Emergency Medicine.

This is a report based on my review of medical and scientific literature and other documents available to me at this time. I reserve the right to make additional conclusions based on any additional information that may be supplied or made available to me in the future, or on personal observations

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Opinions

My opinions are true to a reasonable degree of medical probability and are supported by the facts, evidence, analytical tests and medical and scientific literature.

My opinions are that:

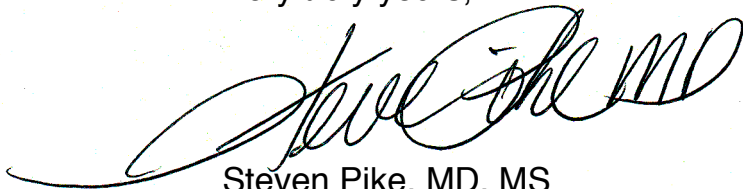
1. The antemortem morphine concentration detected in Ms. Gonzales' blood at 02:45 on May 8, 2014 is medical evidence that neither heroin nor heroin's metabolite, morphine were present in a concentration sufficient to have caused sedation or respiratory depression after Ms. Gonzales was discharged from St. Vincent's Hospital.
2. Dr. Unkefer did not breach the standard of care when he discharged Ms. Gonzales in police custody approximately 2 hours after a 0.8 intranasal dose and a 1 mg intravenous dose paramedics gave her at 19:44 on May 7, 2014 in the pre-hospital setting.
3. At the time of her discharge from St. Vincent's hospital, medical records show that Ms. Gonzales was not in distress, she did not have signs or symptoms of sedation, difficulty breathing or abnormal airway sounds.
4. Video evidence showed that Ms. Gonzales continued to be free of respiratory distress and did not show signs of increasing sedation for at least another 1 hour and 19 minutes after her discharge and 2 hours and 24 minutes after her lorazepam 1 mg IV dose, and approximately 3 hours and 46 minutes after her overdose—based on the observation period recorded on video.
5. Medical evidence shows that Ms. Gonzales' cardiac and respiratory arrests were not the result of any toxic effects of morphine (heroin) or lorazepam, or their combined effects.
6. No breach of the standard of care occurred. Neither Dr. Unkefer nor the nurses at Christus St. Vincent's hospital breached the standard of care.

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Please advise me should you have any questions or desire additional clarification. Thank you for consulting me on this complex and interesting case.

Very truly yours,

A handwritten signature in black ink, appearing to read "Steve Pike MD", with a long, sweeping horizontal line extending to the left.

Steven Pike, MD, MS
FACMT, FACOEM, FACEP, FACCT